

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER XIII
	:	
SHARON C. ROBINSON	:	
TERRY J. ROBINSON	:	17-01910
Debtor(s)	:	

JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION
Movant

vs.

SHARON C. ROBINSON
TERRY J. ROBINSON,
Debtor(s)/Respondent(s)
CHARLES J. DEHART, III,
ESQUIRE, TRUSTEE
Trustee/Respondent

ANSWER TO MOTION FOR RELIEF

NOW COME the Debtors, SHARON C. ROBINSON and TERRY J. ROBINSON, by and through their attorney, Charles E. Petrie, and respectfully answers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.

7. Denied. Debtors have made or will make all payments required under the Mortgage.

8. Denied. The information set forth in this paragraph is in the sole possession of the Movant and is therefore denied.

9. No responsive pleading required.

WHEREFORE, Debtors respectfully request that Your Honorable Court dismiss Movant's Motion for Relief.

/s/ Charles E. Petrie
CHARLES E. PETRIE
3528 Brisban Street
Harrisburg, Pennsylvania 17111
(717) 561-1939
Attorney for Debtors

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ESQUIRE, TRUSTEE :
Trustee/Respondent :

CERTIFICATE OF SERVICE

I, CHARLES E. PETRIE, ESQUIRE, do hereby certify that on this date, I served a true and correct copy of the within Answer, in the above-captioned matter upon the following individual(s), by United States first-class mail, postage prepaid, or by electronic means, addressed as follows:

JAMES C. WARMBRODT ESQUIRE
KML LAW GROUP PC
BNY MELLON INDEPENDENCE CENTER
701 MARKET STREET SUITE 5000
PHILADELPHIA, PA 19106

CHARLES J. DEHART III ESQUIRE TRUSTEE
8125 ADAMS DRIVE SUITE A
HUMMELSTOWN, PA 17036

DATE: 10/19/2017

/s/ Charles E. Petrie
CHARLES E. PETRIE
3528 Brisban Street
Harrisburg, PA 17111
(717) 561-1939
Attorney for Debtors
ID# 29029